

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA ]  
] No. 05-CR-30042-MLW  
v. ]  
] CESAR CRUZ and ]  
RICARDO DIAZ ]

**GOVERNMENT'S MOTION FOR LEAVE TO FILE MOTION IN LIMINE**

The United States hereby respectfully requests leave to file the attached motion in limine, to supplement its motions in limine filed on April 11, 2006. As grounds for this motion the government states that trial counsel is new to this case, having been assigned the matter on April 11, 2006. As the government has prepared for trial and discussed the case with defense counsel, the government has identified additional issues that it believes should be considered by the Court before trial commences on May 1. Thus the government seeks to file the attached motion *in limine.*

WHEREFORE, the government requests leave to file an additional motion in limine, which has been filed simultaneously with this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/: Andrew E. Lelling  
Andrew E. Lelling  
Sharron A. Kearney  
Assistant U.S. Attorneys

Date: April 24, 2006